


TO: Duane L. Shroufe, Director

FROM: Bob Broscheid, Assistant Director 
Wildlife Management Division

PRESENTER: Leonard L. Ordway, Game Branch Chief

TITLE: Presentation of the Proposed Hunt Guidelines for the fall 2008 through spring 2010 for Commission Approval.

DESCRIPTION: The Commission will consider and may vote to approve proposed hunt guidelines for fall 2008 through spring 2010. The Commission may direct the Department to consider changes and/or new opportunities in the hunting and/or trapping guidelines. A detailed description of proposed hunt guidelines is available for public review at all Department offices.

DATE: July 19, 2007

Summary:

The Arizona Game and Fish Department solicits public review and comment concerning proposed hunt guidelines every other year (during odd numbered years). The Department's proposed hunt guidelines (attached) were developed to reflect prior Commission direction, biological limitations, Department input, and public comment. The Department held 12 public meetings during June 2007 to present the proposed guidelines and solicit public input. The guidelines were also posted on the Department web site and noticed through multiple news releases. The public could provide input by mail, FAX, or email in addition to attending a public meeting. At the public meetings, 174 members of the public attended and provided comments (attached). The Department also received 98 individual written responses. Public comment was diverse and not supportive of some hunt guideline proposals. Following is a summary of the comment on the proposed hunt guidelines and Department responses:

GENERAL PUBLIC COMMENTS AND DEPARTMENT RESPONSES

1. *I want quality not quantity hunts.
This recent trend in maximizing opportunity is taking us backwards. Too much focus on lower hunt success rates.
Timing of the post-draw survey was bad and created bias and the questions were directed towards the end result.*

The North American Model of Wildlife Management is based on hunters, anglers, and recreational shooters. Trends in hunters and hunter participation is alarming and may jeopardize

wildlife management in the future because fewer hunters yield lower revenues, but more importantly less social and political support for the wise use and management of our renewable natural resources. The Department and Commission need our traditional supporters, but several studies point out the importance of recruiting new hunters. The guidelines as proposed were designed to provide opportunity while conserving wildlife resources.

2. *I am concerned that your proposals will drive a good management system downhill by managing for reduced buck to doe and bull to cow ratios, along with your other proposals.*
I am opposed to decrease in buck to doe and bull to cow ratio guidelines. We should be using habitat improvement projects. I want to see a quality hunt not quantity.
I am concerned that the Commission direction will be add permits to hunt recommendations to hit lower end of guidelines.
Consider the long term effects on population when lowering male to female ratios.
Consider the biological aspect along with hunter demand.

The guidelines were developed by the Department in accordance to Commission direction. The Commission specifically indicated that the biological limitations of the wildlife resource receive consideration in this effort. The Department relied on peer-refereed publications and studies in the development of these guidelines. The Department will also monitor wildlife populations according to established management guidance and will recommend permits and season adjustments according to the data we continue to collect. The Department and Commission continue to pursue habitat improvements through available fund sources and cooperation with public and private organizations. These guidelines were developed with these comments in mind.

3. *There is already lots of opportunity to hunt in Arizona, but everyone wants to hunt in "their" unit and are unwilling to apply in the areas where there are more tags.*

There are many factors to consider when evaluating opportunity. Many hunters may be restricted by time, cost, and other priorities. The highest demand for opportunity is often in units surrounding metropolitan areas. We have the ability to increase opportunity in most units, both popular and less popular, to provide hunters with more chances to participate. The guidelines were developed to capitalize on this ability.

4. *Use hard data to look at how many people are "trophy" hunters by how many actually put in for those hunts.*
There should be a mandatory check out system for all wildlife harvested.

The Department continues to examine all available data when developing recommended guidelines. The data provided by application data also indicates there is demand for many of the hunts that many people that provided comments find undesirable. Hunts that are undersubscribed (e.g., limited opportunity elk hunts) will be looked at closely to provide over the counter tags. Providing only "quality" hunts would severely limit opportunity for many others that strictly wish to have an opportunity to hunt.

Mandatory harvest reporting is a popular concept for many reasons, not the least is the perception that the Department will have the best possible data. Some states have implemented this system, but even with penalties many hunters are unwilling or unaware of the need to respond. The system of mandatory reporting will require the update of purchasing procedures for over the counter tags through some type of point of sale hardware; the Department continues to research and evaluate implementation of this system. Mandatory harvest reporting may also serve as a barrier to some hunters that inadvertently fail to report harvest. Our current harvest survey is sufficient to meet our management needs.

5. *Doesn't the Department collect field ages on harvested critters? Use that data.*

The Department collects the data and uses it.

6. *The agency needs to think about how to deal with the disappointment that many juniors will have when they are no longer juniors and then find it difficult to draw a tag.*

The Department is working on this issue and is trying to find ways for all hunters to participate in hunts more frequently. Hunter recruitment is only part of the planning, and hunter retention is a big initiative with the Department and Commission as well.

7. *Junior hunt for all species should be before the general seasons.*

Many factors play a role in the planning and timing of a juniors only season. Whenever possible, juniors are provided with the best opportunity for draw or hunt success, although this is not always before a general season. Often, juniors seasons are scheduled to provide a weekend that includes a school holiday.

8. *I like the emphasis on turkey and javelina junior hunts.*

Thank you.

9. *New guidelines are not simple (e.g., archery deer proposal is contrary to Commission direction).*

Simplicity is not the only factor the Commission directed the agency to consider in developing the guidelines. The Commission also asked that the Department provide opportunity consistent with demand, and the proposed guidelines are the simplest fashion by which to attain that distribution. The archery deer proposal tries to distribute harvest using the least restrictive means possible. The easiest way to do this would be to put all archery deer hunts on the lottery draw immediately, yet the least restrictive way is to stage in those units as necessary. This makes the system a bit more complex, yet is the least restrictive approach considered to date.

10. *Offer more primitive weapon hunts to reduce harvest and allow more people in the field.*

While primitive weapon hunts tend to lower hunt success, the Department is also trying to allocate opportunity by demand. As demand for muzzleloader, archery, or HAM hunts increase, the opportunity for those hunts will be increased as well.

11. *Email these hunt guidelines to the public.*

These guidelines were posted on the Department web site and shared through an email release to every email address we had access to. Public meetings were held in 12 cities around Arizona, and comments could be submitted at the meetings or by mail, FAX, or email. A PDF file was sent to anyone that requested it.

12. *I appreciate the Department holding these public input meetings in Sierra Vista. Great presentation, I wish more of the public was here.*

Thank you. The Department hoped all that wanted to attend would have the opportunity to do so.

13. *Publish regulations with number of available non-resident tags.*

For most hunts, 10% of the available tags can be obtained by nonresidents.

14. *Ensure all juniors seasons have two weekends.*

To the extent possible, juniors seasons encompass two weekends or a school holiday. This is not always possible.

15. *Don't shorten seasons anymore.*

To the extent possible, the Department tries to balance season length (opportunity for those that get drawn) with multiple season structures (opportunity for less hunter crowding during a hunt).

16. *Archers have enough time already, focus on general seasons.*

The proposed guidelines attempt to balance opportunity among weapon and season choices.

17. *I think you should add to your hunter questionnaire. I believe you should add a section that asks the respondent to rank the quality of his or her hunting experience (i.e. not just did you kill an animal, but how did you enjoy your hunting experience, and if it was poor, why.*

Currently, the hunter questionnaire is voluntary and increasing the number of questions reduces the likelihood that hunters will respond. Quality of the hunting experience is subject to many factors beyond our control. The questions asked on the questionnaire are designed to assist the Department in assessing the harvest and impact. Asking additional questions at this time does not seem prudent.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING DEER

1. *I would rather see no alternative white-tailed deer units designated, keep the current approach. Keep Unit 32 with the same hunt structure as it is.
The Alternative Management Guidelines for white-tailed deer is a good idea.
I like cool weather and a chance to shoot a mature buck.
I prefer that you manage for quality deer hunt opportunity as opposed to quantity.
Unit 30B white-tailed deer usually has leftover tags, why it is going into alternative management?
Consider Units 24B and 33 as alternative white-tailed deer management units*

The Department provides some alternative management units for deer to meet the varying demands of Arizona's hunters. Alternative management units offer higher hunt success, lower draw odds, old bucks, and fewer hunters in the field compared to standard management units. Some Arizona hunters prefer to wait longer between hunts in order to have a chance at this type of hunt. The Department is implementing the alternative management concept in a few units in response to public comment. The whitetail units selected were based on hunter access, existing hunter densities, existing deer herd demographics and hunt success.

2. *Consider using antler point restrictions to reduce harvest of young deer, which will reduce the overall harvest of deer, increase hunter opportunity, and increase buck quality.*

Antler point restrictions place extra hunt pressure on older age class bucks and further reduce hunter success. Additionally, the restrictions have not been found to have any biological benefits to the deer herds. The limitation on overall permits achieves the same objective and allows the hunter to determine what a "quality" buck is. This finding was supported by the publication Mule Deer Conservation: Issues and Management Strategies produced by the Western Association of Fish and Wildlife Agencies.

3. *You should manage for more big bucks at the Kaibab, and maybe consider antler point restrictions, because I hunted it in 2006 and didn't see any big bucks.*

Results from the check-in of hunter harvested deer on the Kaibab indicate that age distribution of harvested bucks meet the objectives as outlined in the Department's Alternative Deer Management Guidelines. The Department recommends no change.

4. *Regardless of what you do with archery deer opportunity, do not allow archers to hunt deer in Unit 13B. It is nice to have one unit in the state where archers don't have the first opportunity for deer.*

The Department recognizes that deer in Unit 13B would be vulnerable to harvest by archers on water in August-September. The Department will manage archery harvest through season dates

and permit numbers such that age structure of harvested deer in Unit 13B will continue to meet objectives as outlined in the Alternative Deer Management Guidelines. The Department recommends no change.

5. *Leave white-tailed deer permits at 90:10 early:late hunts.*

With deer permits at all-time lows the Department is striving to let as many applicants go hunting as possible. Because December hunt success is generally higher (twice as high in many cases), offering more December white-tailed deer permits means more hunt applicants can not hunt deer. Southeastern Arizona (Region 5, the core of Coues whitetail range) offered less than 6% of their white-tailed deer permits in the December time frame 2001-2005. Limiting these premium hunts to 5% statewide during the current situation of low deer abundance, allows for a more equitable use of the resource.

6. *I don't like managing for lower hunt success and lower buck:doe ratios.
I don't want to sacrifice hunt quality and hunt experience for opportunity.
Lowering buck to doe ratios will result in a lower quality buck harvest.*

The proposed ratio guidelines will not affect deer abundance. Department manages Arizona's wildlife within the biological limits of each species. Management strategies are developed to equitably distribute the resource and to allow as many applicants to hunt as possible without negatively affecting the deer population. For instance, research shows that deer herds can be managed as low as 4-7 bucks:100 does before reproductive capability is affected. The Department has received feedback from hunter surveys stating most hunters prefer a greater chance to go hunting, even if it means a decreased chance to harvest a buck. Harvesting mature bucks is important to some hunters, but most hunters simply want the opportunity to go hunting. Arizona has enjoyed high buck:doe ratios relative to other public land hunting in the West. Lowering the guidelines for buck:doe ratios and hunt success will allow more people to hunt without biologically limiting the reproductive potential of the deer populations. The Department recommends no change to the current proposal.

7. *I am concerned that you may run white-tailed deer into the ground with early hunts.*

Permits are adjusted in each unit annually to address deer population status. Moving a proportion of white-tailed deer permits from the December season dates with relatively high hunt success, to earlier season dates with lower hunt success, allows more applicants to deer hunt without increasing harvest. The Department recommends no change.

8. *Offering four white-tailed deer hunts in southeastern Arizona is too many. That may be too much constant pressure without a break for the animals.*

There is no evidence that consecutive hunts negatively affect reproduction or natural mortality. However, with the proposed change to separate the mule deer and white-tailed deer hunts into different time periods, there may no longer be a need for 4 whitetail hunts. This is will be determined during the normal fall hunt recommendation process.

9. *The stratified deer hunts are great.
Offer three hunts for deer in Units 21 and 22 instead of the current two.*

The proposed hunt guidelines change will allow the Wildlife Managers to recommend this.

10. *Over crowding is really discouraging, especially for new or young hunters*

The proposed changes to separate the hunts into 7-day seasons were designed to address this and should make profound improvements in this regard.

11. *I like the 4-day white-tailed deer hunts, why make them longer?*

The average number of days hunted on a 10-day deer hunt is still only 4 – 4.5 days. There is no reason to limit hunters to 4 days if 7 days will fit in the calendar and not increase harvest appreciably.

12. *Deer hunters should have to choose their weapon and should not be allowed to participate in multiple seasons.*

The Department's goal is to maintain or increase hunter opportunity while not adversely impacting deer populations. Hunters who are drawn for archery deer permit-tags through the draw will not be able to draw general deer tags. However, they will be able to archery deer hunt in units that are open to over-the-counter archery deer hunters. Hunters still can not exceed the bag limit of one deer per calendar-year. This package will allow the Department to manage high archery deer harvest in a few units that need it, while not restricting archers in other units by allowing over-the-counter hunt opportunity.

13. *All deer should be physically checked by the Department.*

The post-hunt questionnaire and field checks provide time-proven sources of harvest-related information. Additional data are not needed to properly manage the deer populations around the state.

14. *You should have mandatory harvest reporting for all deer harvest.
You should enforce the mandatory check out requirement for archery deer hunters and then use the mandatory check data rather than questionnaire data for managing archery deer harvest because questionnaire data are not all that reliable.*

Our current return rate (generally more than 45%) is very good for sampling a population of hunters and allows for good estimates of harvest information in most cases. Post-hunt questionnaire data is better in most cases for General hunts and we are actively taking steps to improve compliance for the mandatory check-in for archery.

15. *You should include the parameters for determining archery hunt demand in the guidelines package.*

Archery demand is determined according to the allocation formula used for elk. In a nutshell, we use 5-year average application demand to allocate harvest. To do so, we must use 5-year average hunt success data to predict this year's hunt success and harvest. For the archery deer hunt, we used average number of archery deer tags sold to compare with first choice applicant demand for general, muzzleloader, and general. Although about 23,000 archery deer tags are sold, about half of this number also apply for tags through the draw. These 23,000 tags are equivalent to 20.3% demand, and when archery harvest in a unit exceeds 20% of the total harvest, restrictions are proposed to regulate the proportion of the take achieved by archers. If archery take is less than 10% of the total take, the proposal is to liberalize seasons for archery deer.

16. *Don't restrict archer harvest until you have more reliable data.*

We are working to improve the archery harvest data, but current data and field experience is adequate to know there are some units where archery harvest should be managed to better allocate the resource.

17. *Shorten the reporting time for mandatory archery deer, keep it over-the-counter statewide, and implement an archery harvest quota unit by unit rather than a permitted archery hunt in some units.*

In order to create an archery deer harvest quota, a Commission Rule change would be required to shorten the mandatory reporting requirement for successful archers from 10 days to 48 hours. This suggestion has been forwarded to the Article three rules review committee.

18. *If you implement an archery deer permitted season in some units, I am concerned that this concept will expand statewide in a very short time.*

It is possible that as some units change to permitted archery deer hunts, more archery harvest will occur in other units offering over-the-counter opportunity. It is also possible that over time, more units will become permitted for archery deer harvest. The current proposal is designed to maintain over-the-counter archery deer hunting opportunity until such time has archery harvest reaches the guidelines for implementing a permitted archery hunt. The Department does not recommend any change to the proposal.

19. *Consider reducing season length on archery deer down to 1-2 days before you permit archery deer hunting opportunity.
Reduce archery season lengths in units with archery harvest >20% to reduce harvest instead of permitting these units.*

Season length may not limit harvest if hunters spend the same number of days a field in the shorter season. Limiting archers to 1-2 days would reduce harvest, but this is contrary to the

Department's desire to allow hunters reasonable opportunity to pursue deer. Permitting, where needed, is a better way to manage harvest and allow maximum hunter opportunity.

20. *Concern over too few archery deer permits through the draw.*

The number of archery permits offered will be the maximum that can be offered and still retain an equitable use of the resource among weapon types.

21. *You could expand archery hunts in the northern part of the state to relieve pressure on the southern part.*

Archery opportunity is distributed where the resource will sustain it. Overloading the northern areas would place an inappropriate amount of pressure on that area. However, in those units in which archers take less than 10% of the total harvest, the Department's recommendation would liberalize archery deer seasons.

22. *Open above the rim units for late archery deer structure. With the USFS road closures it will offer a wilderness hunting experience.*

The Department continues to evaluate opportunity and demand for a variety of hunt structures. The Department also tries to work cooperatively with land management agencies to avoid creating conflicts in use. However, in those units in which archers take less than 10% of the total harvest, the Department's recommendation would liberalize archery deer seasons.

23. *I don't support the proposed archery deer hunt structure. Do not like permitted archery deer hunts at all.
Extend (lengthen) permitted archery deer seasons
Consider keeping December archery deer hunts.
Unit 27 is already less than 20% of the harvest going to archers; can we bring back the December archery hunt?
Permitted archery deer hunts should have rut hunt opportunity.*

Guidelines were changed in response to this comment. In those units in which archers take less than 10% of the total harvest, the Department's recommendation would liberalize archery deer seasons by providing an increasing amount of winter hunt opportunity, beginning in January.

24. *The allocation of archery opportunity between over the counter and draw will be self perpetuating because you will just adjust the number of tags based on demand to keep the harvest level where it needs to be.
You will need a reverse process for removing permitted archery deer units when the harvest goes below 20% for archers.*

Once a unit is placed on the draw system for archery deer, it is unlikely that it will be removed from the draw shortly thereafter. The draw will limit nonresident participation to <10%, and in some units this may result in a substantial reduction in demand. If permits are undersubscribed

for 2-3 years, the Department may recommend the removal of that unit from the draw and place permits back in the over the counter opportunity, but this will require 2-3 years of data to substantiate.

25. *If you make archery deer a draw, it will push hunters out of state.*

Most Arizona archers will continue to participate in their favorite unit or in a nearby over-the-counter unit.

26. *I like the fact that you are proposing to eliminate December archery deer in units where archery success exceeds 20%.*

Thank you for your comment.

27. *Increase season length for archery in units with less than 20% of the harvest coming from archers.*

Archers currently have ample opportunity to participate. The 20% is a maximum the Department will allow and should not be considered a target for each unit. However, in those units in which archers take less than 10% of the total harvest, the Department's recommendation would liberalize archery deer seasons.

28. *Unit 42 is included among the units with greater than 20% of the overall harvest coming from archers. I believe that most of the archery harvest in Unit 42 comes from the White Tanks. Rifle hunters can't hunt the White Tanks, so archers are not limiting rifle opportunity. For Unit 42, do not consider the archery harvest from the White Tanks as part of the 20% criteria for determining this unit to go to a permitted archery hunt.*

Although a portion of Unit 42 is only open to archery hunting, the deer that occupy that area routinely move out of the area only available to archers. Recent data from an ongoing research study in this area substantiates this phenomenon. Any harvest in that portion of the unit influences the buck:doe ratio in the entire unit.

29. *In units with low total deer harvest, the 20% limit on archery harvest should not apply. You should look at the raw number of deer killed by archers, not just the percent of overall harvest achieved by archers*

Despite the fact that some units have low numbers harvested overall, the impact of that harvest is reflected in changes to buck:doe ratios and the proportion taken by archers restricts opportunity by general season hunters.

30. *I like that the permitted archery deer season proposal will limit nonresident participation in the units north of the Colorado River. I support the proposal to permit archery deer hunts in some units. I believe it is a good idea.*

I support the proposed archery deer hunt structure.

It is good to see some restrictions and regulation on archery deer harvest.

Thank you for your comments.

31. *The guidelines indicate that juniors deer and fall turkey hunts will overlap (starting Friday of week 41). This should not be the case.*

The Department has revised its guidelines proposal to remove this overlap.

32. *I like juniors-only hunts, but I don't believe that they should be offered trophy hunts.*

The current proposal does not include any bull elk, antelope, or rut deer hunt opportunities for juniors.

33. *Consider offering a draw whereby a junior could get both a deer and javelina permit together (same time and place in single draw)*

In response to this suggestion, the Department structured the deer and javelina juniors-only hunts so they can occur at the same time. This will allow juniors to be drawn for both tags during the same season in the same unit.

34. *The overlap between Unit 32 junior deer and whitetail hunts should be changed*

The Department has incorporated this suggestion into its guideline package and the Unit 32 junior deer hunt will not overlap a general whitetail hunt.

35. *The general permits that will be generated as a result of the reduction in archery deer harvest should go to junior-only hunters rather than to general hunt opportunity.*

General hunt opportunity will be allocated to hunts that are currently available in that unit. Not all units have juniors-only hunts. Juniors only opportunities will be offered consistent with Commission direction.

36. *Increase the juniors-only buck deer allocation to >5%.*

The current guideline package recommends an increase in junior hunt allocation from >2% to at least 3%. This represents a minimum number and the Department will recommend permits to capitalize on recruitment opportunities.

37. *Increase the number of units for juniors-only buck hunting (e.g., include Unit 34A).*

The proposed hunt guidelines will make it easier for the Wildlife Manger to add juniors-only hunts. This specific suggestion will be considered during the next fall hunt recommendation cycle in February 2008.

38. *The Department and Commission should have increased hunter opportunity when we really had a lot of deer if you wanted to increase hunters in Arizona.*

During the period of high deer abundance, there were more permits available than hunters to use them. That was a good opportunity to allow more members of the public to support the North American Model of Wildlife Conservation by becoming hunters.

39. *Nonresidents are over using the resource.*

The Department's adaptive harvest management prevents the overuse of the resource. Premium hunts have non-resident limits and units with excessive archery harvest would be limited under these proposed guidelines.

40. *The December hunt time frame should be reserved for those that draw a general season permit. I don't want to compete with archers during this time frame. Archery bull elk hunters didn't want archery deer hunters in the field with them, and I don't want them in the field disturbing deer during my hunt.*

It is impossible for the Department to separate hunters for all weapon-types for all species during all periods of the year. We all have to learn to share the resource for the greater good of our hunting heritage.

41. *You have a coordinator for archery in the schools program that is doing a great job getting lots of kids into shooting bows, but the Department has not created an avenue to take the kids directly from the archery in the schools program into hunting. The Department needs to create that nexus so that archery in the schools becomes a direct pipeline to create new archery hunters.*

Very good comment. This specific issue has been discussed by the Department's Hunting Heritage Working Group and will be fully explored by them.

42. *I am concerned that anti-hunters will feel they have achieved success by reducing archery deer seasons.*

It is unlikely anti-hunters will be able to successfully claim victory for changes to improve the management of the archery harvest.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING PRONGHORN

1. *The early draw for elk and pronghorn was a great idea.*

Thank you. Most of the public input received was supportive of the transition of elk and pronghorn to an earlier draw.

2. *Pronghorn should be managed conservatively and population trend should be monitored closely.*

Pronghorn are surveyed annually in most units and hunts are managed in a very conservative fashion. While buck to doe ratios are watched closely, so is recruitment and population trend. Population translocations are being implemented as are predation management plans and habitat restoration efforts to improve pronghorn populations.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING ELK

1. *Be very careful with limited opportunity over the counter elk hunts; there are private property and access issues. Also keep sportsmen's expectations in mind relative to harvest and hunt success. Be aware of land owner impacts and coordinate through HPC process.*

The Department makes every effort to address elk management in an appropriate fashion. Limited opportunity elk hunts will be analyzed on a case-by-case basis by each AGFD Regional Office before being considered for over-the-counter elk tags. The Department intends to notify landowners and respective local HPC groups if it is the Department's intention to go this direction with a particular limited opportunity hunt area.

2. *There is no measure on age for alternative elk management, just antler points. Consider cementum aging in alternative management units.*

Although the Department does not have cementum aging in the guidelines, this technique has and will continue to be used in several of the alternative elk management units to manage for older age class bull elk in addition to antler points. The time between submission of teeth for age determination and receipt of analyzed data does not allow for its use in annual hunt formulation.

3. *General late bull hunts seem to keep creeping later and later. Now they overlap with sheep hunts which make it impossible for outfitters to book both types of hunts. This is also a potential conflict in Unit 27 where sheep and elk hunters may be hunting same areas.*

The current late bull hunt structure was initiated in the fall of 2006 in accordance with Commission direction to standardize hunts statewide. In many units around the state an earlier weekend is not available because of various other hunts already occurring. Elk and bighorn sheep hunter conflicts are not expected to be a problem.

4. *How are we to increase elk herds according to Commission direction while providing more opportunity? That seems like a contradiction.*

Why are you recommending a reduction in the target bull to cow ratio guideline? Are you considering the fact that the department has said you have less elk than your target population on a statewide basis?

I like the wider bull: cow ratio, it may reduce antler breaking.

I am not in favor of wider bull:cow ratio or buck:doe ratio.

The Department recommends a reduction in the target bull to cow ratio guideline consistent with Commission direction to increase hunter opportunity while not impacting the species biologically. The harvest of males does not place excessive pressure on an elk herd if reasonable bull to cow ratios are maintained to assure breeding. From a biological perspective, removing surplus bulls from the population leaves more food resources for the cows, which will produce the calves for the following year. The bull:cow ratios in the proposed guidelines assure adequate bulls for breeding while allowing more people the opportunity to hunt. Reduced bull:cow ratios may limit antler breakage as well.

5. *Demand for elk in Arizona is high because of the high quality of the bulls harvested. By increasing opportunity you may compromise quality.*

The Department has retained the alternative elk management guidelines for Units 1, 9, 10, and 23 where the Department manages for a higher bull:cow ratios and older age class bulls to help meet demand for quality. Older age class bulls (quality) continue to be harvested from standard management units and the average size of harvested bulls has been steadily increasing over the last 20 years. Arizona's management by limited entry draw has provided the quality elk that we currently enjoy.

6. *I like the proposed over the counter tags for some limited opportunity elk hunts.
I like the proposal to offer over the counter limited opportunity elk hunts, especially since this does not affect my bonus points.*

The Department believes this may be an effective elk management tool in those areas designated as Limited or Winter Range Elk Management Zones.

7. *Consider offering hunts for elk that force people to hunt areas with difficult access, such as a wilderness area hunt in the Blue Wilderness.*

The Department does currently offer some wilderness elk hunts (See Matazal Wilderness Hunt in Unit 22) and retains the ability to subdivide elk management units to force hunters into areas where elk may need harvesting based on population characteristics.

8. *Let elk eat the underbrush to reduce the fuel loads on the mountain. Increase elk herds in southeastern Arizona for more hunter opportunity.*

Per Commission direction, Southeastern Arizona has been designated as a Limited Elk Management Zone and therefore elk will be managed at very low density. The Department emphasizes small game, deer, and javelina hunting in southeastern Arizona.

9. *Use over the counter opportunity and not fiddle around with only a few tags here and there.*

That is the intent of the proposed hunt guidelines although some areas may only warrant a few permits based on access and topographical concerns.

10. *You need to make sure there are no other hunts overlapping early rifle bull hunts. Last year we had an early bull tag that opened at the same time as a 150 permit junior deer hunt and a bear hunt. The guys who draw that tag have waited 15 years and should be able to have their day in the field.
Make sure there is no overlap of junior's deer and bull elk hunts.*

That is the intent of the proposed hunt guidelines.

11. *If you are not selling all of your tags for limited opportunity elk hunts, you should raise the bag limit on elk.*

The Department has been selling most of the limited opportunity elk permits, but has the opportunity to offer over-the-counter permits in select areas to further help the Department meet its elk management goals in particular areas. In 2001, public opinion obtained during the development of rules that allowed for the authorization of population management seasons indicated that most hunters did not support a higher bag limit for elk. Over-the-counter permits would remove the need for applying and unsuccessful applicants and hunters could purchase one of these tags to participate in an elk hunt without losing bonus points.

12. *Maximizing opportunity while land management agencies are proposing restricted access for vehicles and camping is a bad idea.*

The Department continues to work with land management agencies to ensure the needs of our customers are met with current travel management and dispersed camping planning. The Department encourages its customers to get involved and submit comments to the land management agencies during this process.

13. *I am concerned that over-the-counter elk tags will create an enforcement issue because anyone with an over the counter tag could harvest an elk in any unit and claim it was taken in a limited opportunity unit.*

The Department will handle any potential law enforcement issues related to over-the-counter elk permits on a case-by-case basis and will continue to rely on active patrol efforts and the Operation Game Thief Program whereby the public is expected to report violations.

14. *I had a late Kaibab deer tag and I saw that somebody killed an elk near Sowats.*

All successful elk and buffalo hunters in Unit 12A are required to check-out their animal at the Jacob Lake Check Station. The Department received no formal check-out of an elk killed on the Kaibab.

15. *If you establish a November hunt in addition to September hunts, you should allocate antlerless permits during the November hunt to avoid overlap with bull hunts.*

The Department considered moving a portion of the archery antlerless permits to the November structure, but is recommending a two-year time frame to evaluate hunter demand on the November archery bull hunts before making any further changes.

16. *Try to offer the highest quality archery hunts with fewest hunters in the field; I am willing to wait to hunt.*

This does not meet with current Commission direction. Based on the 2006 post-draw hunter survey, further restricting hunter opportunity to provide more quality hunting is not consistent with what the majority of hunters in the state of Arizona prefer. The Department has retained the alternative elk management guidelines for Units 1, 9, 10, and 23 to help meet demand for quality where the Department manages for a higher bull to cow ratios and older age class bulls.

17. *You should consider having late archery hunts not just in November, but December and January also. I don't see how you can fit archery elk hunts into your calendar in November without overlapping different hunts.*

The Department carefully looked at the fall hunting schedule and the November 14th (2007) and November 13th (2009) start dates work for most units except Unit 6A which has a late muzzleloader elk hunt. In that unit we are proposing a shorter archery hunt to avoid the overlap. The Department is recommending a two-year time frame to evaluate hunter demand on the November archery bull hunts before making any further changes.

18. *Don't mess with September archery bull hunts. They are the best in the country, and Arizona is known worldwide for these hunts.
I am not in favor of moving early archery elk permits to November.
Use a post hunt survey to look at quality and demand for November archery bull hunts.
You should increase the number of archery antlerless elk tags during the rut.
Use archery elk structure proposed for a couple years before put in allocation pie.*

The Department recommends no changes to the September archery elk hunts with these guidelines. The Department is recommending a two-year time frame to evaluate hunter demand on the November archery bull hunts before making any further changes.

19. *November archery elk hunts are acceptable if you have some time between the general-muzzleloader hunts and the archery hunts. I don't want to hunt elk while others are hunting camp sites and scouting.*

The Department realizes that there will be little time between hunts with the proposed November archery elk hunt structure. Department data indicates that most hunters hunt only the weekends leaving several days of only a few people hunting before the opening of the next hunt on the following Friday.

20. *You should spread out muzzleloader elk hunt opportunity to more units because it is not offered in enough places (example, most of the tags in the state were in Unit 6A last year).*

Opportunities for muzzleloader hunters are carefully allocated according to an established allocation formula that takes into account historic hunt success and first choice application rates. The Department recommends that the Commission continue with this highly successful and equitable allocation of opportunity. With the recommended November archery elk hunt structure it leaves no other units to place muzzleloader hunt opportunity.

21. *You should make the new late archery bull hunts available to youth only.*

This does not meet with current Commission direction.

22. *Increase juniors-only cow hunts to 10%.*

Juniors opportunity is offered in a greater proportion than demand would dictate currently. This direction is at the discretion of the Commission, although the Department recommends no change to current guidelines.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING TURKEY

1. *I support shotgun only spring and fall turkey.
Fall hunt success ranges from 13-30% and is variable year to year. Shotgun-only regulation will only result in buckshot wounding birds and I'd rather not have a hunt at all. Retain rifles for the fall hunts.
I disagree with the previous statement about needing rifles in fall turkey hunt; I can get in bow range in the fall turkey hunt.
How many states with turkey seasons allow rifles in the fall?
I like shotgun shooting shot for both spring and fall seasons. You shouldn't hunt turkeys with a rifle.
I support the proposed switch to shotgun only for fall turkey.
I like the proposed limited weapon shotgun shooting shot fall season.*

The Department is recommending the fall season for turkeys as a limited weapon shotgun shooting season. Both spring and fall hunt success varies widely among years, largely in response to population fluctuations and nesting success. Wounding loss has been shown to be greater for rifles in some studies than is wounding loss for shotgun, and the likelihood for having an animal die from a shotgun wound if it escapes is less than the likelihood of dying from a rifle wound. The predominately used weapon in the fall season is a shotgun, and archery equipment is still legal to use in the shotgun shooting season. Archery turkey seasons would remain unchanged. Many states currently limit fall hunters to the use of shotguns, and the probability of human fatality is substantially reduced in the event of an accidental shooting with a shotgun when compared to a rifle.

2. *Start spring turkey the Friday after New Mexico's opener.*

Arizona's spring turkey season is scheduled to occur after most of the breeding is complete and many hens have initiated egg laying and in some instances incubation. The timing of the spring season limits the probability that spring hunting will influence nesting, hen mortality, and nest success.

3. *Eliminate the second stratified spring season.
Appreciate the current hunt structure with the combined hunt for those who were not successful during weeks one and two. "It feeds my soul."*

The stratified spring season allows Arizona to offer more hunting opportunity by reducing hunter crowding and spreading the harvest across a longer time frame. Most hunters participate in the early portion of their seasons and do not create hunter crowding problems in the latter part of the seasons. The Department does not recommend any change in response to this comment.

Juniors

4. *Allocate a proportion of the permits to juniors (like the 5% you suggest), but do not offer over the counter juniors only opportunity in the spring.
Unlimited juniors spring turkey would have impact on general spring turkey hunts. Fall juniors over the counter is OK, but not spring.
Increase junior spring turkey to 10% on top of what we already have (additive).
Junior turkey hunt this year was great. Good to be there without other hunters in the field.
I like the proposed guidelines giving over the counter tags to juniors.
I think youth should get spring over the counter tags.
You should not issue juniors over-the-counter tags, but a conservative increase in spring juniors turkey tags would be appropriate.*

There is extremely limited demand for either juniors only spring (461 applicants for 165 tags in spring 2006) or fall (246 applicants for 150 tags in fall 2006) turkey hunts and no biological impacts to the turkey population is anticipated. The Department will recommend offering

juniors only spring and fall hunting opportunity over the counter juniors tags for turkey populations that score either an A or B using the hunt recommendation formula.

5. *Not many juniors can shoot a shotgun so eliminating rifles as an option for fall turkey will hurt juniors. Allow juniors to use any weapon for fall turkey.*

There is no evidence to suggest that juniors have any greater difficulty in learning to fire a shotgun than a rifle. Shotguns have a much greater safety record than do rifles in turkey hunting. The Department does not recommend any change in response to this comment.

6. *Increase both adult and youth tags through the draw*

The Department will recommend permit numbers consistent with the approved hunt guidelines.

7. *The guidelines indicate that juniors deer and fall turkey hunts will overlap (starting Friday of week 41). This should not be the case. Juniors deer and over the counter juniors turkey season dates should overlap. If juniors deer and over the counter juniors turkey seasons overlapped, would you foresee any safety issues?*

The intent of the guidelines was to avoid overlapping turkey and deer seasons. Turkey seasons have been adjusted so that they will begin on Friday of week 40, rather than Friday of week 41.

8. *There should be more permits offered for Gould's turkey in Unit 35A.*

The Department is managing the Gould's turkey population in Unit 35A as a source for continuing restoration efforts. Although a limited harvest is recommended annually, the Department is removing about 40 turkeys from that population annually as part of the restoration effort. The Department will recommend increases to Unit 35A permits as monitoring indicates the availability of adequate birds and translocations from this area are no longer necessary. The Department will also recommend Gould's turkey permits in other units as the restoration continues.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING JAVELINA

1. *I am opposed to any fall javelina hunting.*

Fall javelina hunts have resulted in limited harvest and have had no detrimental effect on javelina herds. The Department will continue to monitor javelina herds by unit and modify future hunt recommendations based on biological data.

2. *Over the counter archery javelina in metro areas will put us all on television news with bad press.*

The opportunity to hunt javelina and other species currently occurs in the metro units and has not received negative press.

3. *Fifty percent of all general javelina permits should go to juniors.*

The Commission has directed the Department to emphasize hunter recruitment and retention and focus on juniors hunt opportunities. Nevertheless, there is substantial demand for hunters other than juniors that enjoy hunting this species and 50% opportunity for juniors may be excessive and undersubscribed (e.g., in 2006 there were only 682 first choice applicants for juniors only tags). The Department recommends that 10% of the total javelina permits will be allocated to juniors-only seasons. Demand rate will be monitored to see if there is a need to adjust this percentage.

4. *Juniors javelina should focus on the units in southeastern Arizona where there are always leftover tags.*

The Department's recommendation is to offer all fall javelina permits as juniors only opportunities, and these hunts do focus on the units in southeastern Arizona.

5. *Javelina herd size of 7-9 is too low and so is the juvenile:adult ratio.*

The herd size guideline of 7-10 total animals (6-9 adults) and juvenile:100 adults of 20-30 is biologically viable and based on data collected in Arizona. Other parameters such as hunt success and population trend are also used to monitor javelina populations.

6. *Consider offering all left over permits to juniors.*

The demand for juniors hunting opportunities has not been demonstrated to exceed that for all hunters. Juniors have an equal opportunity to acquire these tags as do adults. The Department is recommending an increase in juniors hunt opportunities, and additional changes in regulation and Commission action would be needed to change season designations for leftover tags before they could be offered to juniors only exclusively.

7. *Consider offering a draw whereby a junior could get both a deer and javelina permit together (same time and place in single draw).*

The Department recommends that juniors javelina and deer hunting opportunities be offered through separate draws so that opportunity to participate in this recreational activity is offered to as many individuals as possible.

8. *Consider offering over the counter javelina tags in under subscribed or remote units.*

The Department has distributed opportunity consistent with demand and Commission direction. Currently, the number of leftover permits has been addressed through several venues, such as the establishment of fall javelina hunts. Recent demand has been complicated by changes in the

draw processes and increases in tag fees. The Department may recommend offering over-the-counter javelina opportunities in some units in the future, although we do not recommend this change in the current guideline process.

9. *Eliminate the fall javelina hunts. Javelina are not as active in the fall. In January they are more active during the day and that is better for juniors.*

There is a demonstrated demand for the fall hunts and this structure allows the Department to create more hunting opportunity. The Department recommends no change to proposed hunt guidelines in response to this comment.

10. *Why can't archery javelina hunters have all of January again? Offer all of January for archers and then give juniors two weeks in February.*

The Department recommended and the Commission adopted a slightly shorter archery javelina season in an effort to eliminate overlapping juniors and archery season hunts and to attempt to equalize hunt success among weapon types. The Department recommends no change to proposed hunt guidelines in response to this comment.

11. *Increase the juniors-only tags in that late January and early February hunt; shift opportunity from hunts with unused tags.*

The fall juniors hunt proposal allows the Department to offer juniors hunting opportunities throughout the year and increase the potential opportunities to recruit new hunters. Shifting all permits to the spring season could result in greater crowding issues for juniors during their javelina hunts.

12. *Go back to over the counter archery javelina.*

Archery hunt success and demand rate does not allow for over the counter tags. Javelina permits for other weapon types would have to be reduced although they have a higher demand rate.

13. *Include all of January for archery javelina and allow overlap of juniors javelina hunt.*

The archery javelina season was shortened for 2 reasons: (1) to avoid an overlap between archery and juniors hunts while allowing juniors more time to hunt and (2) to equalize hunt success among weapon types. Crowding archery hunters on top of junior hunters is not considered a desirable option to encourage juniors hunting.

14. *Archers are becoming more and more effective. You should shorten your archery javelina hunts to 10 days, and stratify them (offer two or three 10-day hunts instead of offering one 30 day season).*

Archers continue to request longer seasons rather than shorter seasons with less crowding. This idea has merit, but will be considered in the future should archery hunter densities reach a point that negatively impacts the success, safety, or quality of the hunt.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING BIGHORN SHEEP

1. *Be careful about micromanaging bighorn sheep when you subdivide units. Hunters, rather than the Department, should determine what is a harvestable ram.*

The Department is not trying to identify individual rams for hunters to harvest. The Department has the opportunity in some instances to increase permit numbers when older age class animals are available in portions of units that routinely receive little hunting pressure, and in other instances the Department is able to limit the removal from a portion of a unit that receives substantial hunting pressure.

2. *I am concerned about the decline of the sheep in Unit 45B and the number of rams. Unit 45 should not have a hunt that extends beyond December. Kofa should not be hunted until there are at least 600 animals in the population.*

In Unit 45B, permits have dropped from 5 in 2003 to 1 in 2007. In addition to permit reductions the Department, in cooperation with the Kofa National Wildlife Refuge, has recently completed an investigative report containing recommendations to help restore the bighorn sheep herd on the refuge. The Department is engaged in aggressive management actions in the Kofa Mountains and Units 45A, B, and C. The Department has been working cooperatively with the Kofa National Wildlife Refuge to improve water distribution and monitor bighorn sheep. Lion management actions are also being implemented. The Kofa population is currently depressed in numbers, but is still larger in numbers than many other units where hunting occurs. Bighorn sheep hunting is extremely conservative and is not expected to impact the overall health of the bighorn sheep population. Monitoring efforts have been increased, and there is no intention to increase the length of the hunting season in those units.

3. *Department should have aggressive monitoring action on large predators and ram numbers.*

The Department monitors bighorn sheep populations regularly and management actions are implemented when populations demonstrate a need for intervention. When sheep populations experience significant declines and predation is shown to be a contributing factor the Department uses a number of tools to diminish the affects of predation such as multiple bag limits for mountain lion for all or portions of hunt units, intensive monitoring and removal of lions shown to be preying excessively on bighorn sheep, and increasing perennial water sources to spread distribution of bighorn sheep during water stress periods and thereby decrease successful predation.

4. *I support the new bighorn sheep guidelines.*

Thank you.

5. *All bighorn sheep hunters should have to attend a mandatory hunter clinic for successful applicants.*

The Department annually assists the Arizona Desert Bighorn Sheep Society in their annual hunter clinic. This is an opportunity for those that can participate to learn as much as possible from experienced hunters, guides, and Department personnel about their individual hunting opportunities. A mandatory clinic would be a barrier for those that are not available on a given date or time, or could not travel to the site of the clinic. Although a clinic is useful, it does not predict the experience that a hunt participant will have.

6. *There are a number of volunteers in this area that would be willing to assist with supplemental ground surveys for bighorn sheep. We have pictures and video and this data could increase the number of permits you could offer in Unit 12B.
Offer more sheep permits in Unit 12B.
There are more lambs in Unit 12B this year than I have ever seen before (approaching 80:100).*

Thank you for the offer and the data. The Department routinely surveys bighorn sheep populations using helicopters every three years unless special conditions warrant more effort, such as a declining population or a translocation will be taken from the unit. Supplemental surveys conducted in a different manner, like a ground survey, can be difficult to compare with survey trends obtained from aerial surveys. Nevertheless, the Department often engages in these efforts in cooperation with volunteers to corroborate opportunities or concerns where they exist.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING BUFFALO

1. *I am concerned that year long pressure on House Rock herd would keep buffalo on Grand Canyon National Park (GCNP) all year.*

A variety of hunt structures have been used in the recent past including frequent short hunts with few permits. Hunt success has continued to dwindle and frustrate hunters that have been drawn on this hunt. The Department believes that a year long season with few permits present at any given time may best afford hunters the opportunity to harvest buffalo when they are available. This strategy should also prevent the hunter crowding that can take place during a season with a restricted length and that contributes to buffalo migrating to the GCNP.

2. *Get the Park Service to allow hunting on their lands.*

The Department and Commission continue to coordinate and cooperate with the National Park Service on this issue. Specifically, the Association of Fish and Wildlife Agencies, the Western

Association of Fish and Wildlife Agencies, and the U.S. Congress are working to resolve the matter of using sportsmen as volunteers to manage wildlife on National Park Service lands.

3. *Population Management Hunts should not be for bulls.*

The Commission has directed the Department to reduce the number of buffalo in the House Rock herd. The Department believes that no restriction in regards to the age or sex of a bison that can be harvested maximizes a hunter's opportunity to harvest buffalo when they become available. The Department recommends no changes in response to this comment.

4. *Year round buffalo hunts would have an impact on the auction tag holder and the amount of money that it raises.*

The Commission has directed the department to maximize hunter opportunity. The use of a year long season and the maintenance of a low number of permits throughout the season, coupled with the companion tags offered to general deer season permit holders, will maximize this opportunity while providing the best opportunity for buffalo permit holders to harvest a bison. This approach is also consistent with the Commission directive to lower the population of buffalo at House Rock Wildlife Area.

5. *I like the proposed yearlong structure for buffalo on House Rock Wildlife Area.*

The Department appreciates your support.

6. *You should offer an archery-only buffalo hunt.*

Under the propose guidelines permit levels at any given time on the House Rock Wildlife Area will be few in number. This will result in a very low hunter density enabling any individual hunter to hunt with the legal method of his or her choice.

7. *I like the buffalo season proposal on House Rock Wildlife Area.*

The Department appreciates your support.

8. *Quit offering population management permits to deer hunters in Unit 12A.*

The Department has recommended no general season permits for the House Rock herd for fall 2005 because hunt success has been extremely low and substantial numbers of dissatisfied hunters have voiced concerns to the Department and Commission. The Commission has further directed the Department to reduce the number of buffalo in the House Rock herd. The Department believes that population management seasons are the best opportunity to harvest buffalo when they become available and tailor hunter numbers to meet harvest objectives. The Department recommends no changes in response to this comment.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING BEAR

1. *Provide general season hunts during the month of September. August is too hot and in October most bears have left the prickly pear areas.*

The proposed guidelines currently offer the option of archery or general seasons during September. Units that have archery deer and elk hunts during September will likely offer the archery bear hunt during this time frame to minimize conflicts between archery hunters and general hunters. Some units may offer the general hunt during September, especially those with adequate prickly pear habitat.

2. *Consider offering the archery bear hunt into September again so we can hunt them on prickly pears.*

Archery bear hunts are currently offered in many units during the September season. The new guidelines will also make general seasons an option for wildlife managers during September.

3. *Consider offering a portion of the fall bear season (1-2 weeks) when hounds are not allowed prior to a season when hounds could be used to hunt bears.*

Commission Rule does not currently allow for exclusion of hounds for hunting bears in the fall. Additionally, the five months spring season for bears is already closed to the use of hounds.

4. *Eliminate the spring bear seasons because cubs aren't always seen with sows.*

Spring bear hunts harvest very few bears, and even fewer females. Last year, only 7 bears were taken statewide in all spring hunts. In many years, not even a single bear is reported taken. There is no evidence that spring bear hunts are having any impact on the bear population.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING MOUNTAIN LION

1. *Adopt a single season for mountain lions statewide that does not allow for multiple bag units remaining open yearlong.
Abandon the ill-advised multiple bag limit strategy because it is not science based.*

Multiple bag limits are recommended within units or portions of units where a prey population may be negatively impacted by mountain lion predation. Temporary reductions in mountain lion numbers have been shown to benefit prey species, and no negative impact to long term mountain lion populations have been shown to occur as a result of increased harvest. These management recommendations are based on peer-refereed mountain lion research.

2. *Decrease mountain lion season length from the current 9 month season to 5 months to protect the entire birth pulse.*

The Department implemented a 3 month season restriction beginning in 2007. This was largely a social decision because no negative impact from the existing yearlong season could be detected on the trend in mountain lion populations in Arizona. There is no biological need to restrict the mountain lion season further.

3. *Maximize hunter opportunity by returning the mountain lion season to a yearlong structure.*

The Department recommended and the Commission approved a 3 month restriction on mountain lion hunting based on the Predator Team Report, prepared by an internal agency team. The Department does not recommend that the season be altered at this time until changes to season structures are in place for 2-3 years and changes can be evaluated. Currently, mountain lion hunting opportunity remains in those units with multiple bag limits.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING SMALL GAME AND OTHER BIRDS AND MAMMALS

1. *Start tree squirrel season one week later so there is no overlap with the opener of fall turkey (opening weekend conflicts).*

The recommended squirrel season opener was changed to Friday of week 40 (October 3, 2008 and October 2, 2009) to avoid conflict with the early bull elk and juniors deer season openers. There will still be an overlap with fall turkey because this season was also moved to week 40. This means that there will still be the same season opener for both squirrel and turkey, but many turkey hunters also enjoy hunting squirrels at the same time. There have been few conflicts with the combined opener. This change was the best choice given the other hunt openers during that time of year.

2. *Start quail hunt later in October (a week or two) because season is often too hot and too many young birds.*

Opening day of the desert quail seasons is recommended to open on Friday of week 40 (October 3, 2008 and October 2, 2009), which is a week earlier than originally proposed. The desert is hot this time of year, and there is a possibility of shooting young quail. Typically however, when hunters encounter young quail opening weekend, it is because there was a pulse of late season reproduction, and those pulses occur during good reproductive years. The change to an earlier date will not hurt quail populations. The earlier opening allows additional opportunity to those hunters who want it. Hunters who do not want to hunt that early can hunt later.

3. *I like the proposal for extended squirrel season dates.
I like the proposed squirrel season extension statewide.*

Thank you. The extended season dates allow more squirrel hunting opportunity without hurting long-term squirrel populations. When squirrels are abundant hunters will take advantage of the longer seasons. When squirrels are less abundant, few hunters will take advantage of the longer season.

4. *Why can't we have fixed-date standard seasons for all small game? For example: October 1 – February 1 (Mearns' quail could still be later for biological reasons).*

Fixed season dates simplify hunt structure for some hunters, and complicate it for others. With fixed dates, seasons will often open on weekdays. Many hunters prefer that small game seasons open on weekends so that they can hunt on opening day. The proposed hunt structure requires that hunters consult the regulations to confirm opening days. The Department thinks that the proposed structure will be preferred by most hunters.

5. *Are dove numbers good enough to have afternoons for all hunters? Afternoons in the early hunt would increase the number of dove hunters because people could hunt after work.*

The afternoon hunt in the early dove season (September 1-15) is available to junior hunters. The half-day hunt structure was adopted in 1989 in response to declining dove harvest and call count population indices in Arizona. Following the half-day season implementation, harvest for mourning doves has recovered, but call counts for mourning doves continue to decline in Arizona.

6. *I like the idea of extending the Abert squirrel seasons year-round in Units 31 and 33.
Remove the bag limit for Abert squirrel in Units 31 and 33.*

The reason for the year-round season proposal in Units 31 and 33 was designed to address concerns over possible competition among tassel eared, Arizona gray, and Mt. Graham red squirrels in the same habitat. The Department believes that the best management tool to address this conflict is hunting.

The increased daily bag limit proposed for Units 31 and 33 are sufficient to address the management concern we have in those areas. Because of the difficulty topography in those units, few hunters will be effected by the liberal bag (10 per day, 20 in possession) proposed. An unlimited bag would have little if any effect on tassel-eared squirrels in those units.

7. *Your seasons are already too long. You should not extend the closing date any later than it currently is because I am seeing quail starting to pair up in February.
I like the quail season extension proposal*

The closing date for all quail seasons was changed to end on the second Sunday in February (February 8, 2009 and February 7, 2010). The season has been extended by opening a week earlier than in previous years (see comment above). By opening the season one week earlier, the Department offers more hunter opportunity during the time of year when it will least effect quail populations.

8. *Extend the closed season for at least one month to July 15, and impose a bag limit on individuals who shoot Gunnison's Prairie dogs.*

The Arizona Game and Fish manages hunted species for sustainable harvest. The current seasonal closure has allowed prairie dog populations to increase in areas across the state; a further restriction of this hunting season is not warranted at this time. We will continue to monitor the population so that a sustainable population can be maintained.

The Arizona Game and Fish imposes bag limits in an effort to restrict impact on a hunted species. Given that prairie dogs appear to be increasing across the state, a bag limit is not warranted at this time.

9. *We are concerned about the impact of lead ammunition, especially in light of the fact that prairie dogs taken are left to die, making it much more likely that other animals will ingest lead from these animals.*

The Department is aware of the recent literature discussing the impact of lead ammunition on wildlife and we are continuing to monitor the situation. Pilot lead reduction programs such as the Condor lead reduction program have already been implemented. The Department will continue to monitor this issue.

PUBLIC COMMENTS AND DEPARTMENT RESPONSES REGARDING PREDATORS AND FURBEARERS

1. *You should manage for fewer predators in some areas to benefit prey species. Start an aggressive predator control program.*

Hunting and trapping efforts by sportsmen across the state provide the bulk of predator management in Arizona. Opportunities are available throughout the year for sportsman to harvest predators and the Arizona Game and Fish Department realizes the importance of these efforts in maintaining a sustainable balance between predator and prey populations within the state. The Department does conduct predator management efforts in specific areas throughout the state where prey species require relief from increased levels of predation. Our Wildlife Managers and Game Specialists routinely survey prey populations throughout the state and predator management efforts are conducted when fawn to doe ratios cross a predetermined minimum threshold for the respective species.

2. *Promote predator hunting in news releases and public outreach.
Emphasize predator hunting with small game hunting outreach and camps.*

The Department routinely provides information to predator hunters on areas where prey populations may benefit from increased predator hunting. We are planning on incorporating a predator calling session into the instructional small game hunter camps hosted by the Department that will be conducted throughout the state in the coming months. Please refer to upcoming issues of Wildlife Views and the Department's website for a small game camp in your area.

3. *The season dates for mountain lion, bobcat, and fox do not match. You should coordinate the season dates for all three of those animals to make it easier for people to understand.
Allow year round hunting of all predator species.*

Season dates for each of these species are set to correspond to a time of year when the harvest of each species allows the animal to be taken at its prime (seasonal fur development) and/or the harvest of the species can be conducted with the least impact on recruitment.

4. *Allow bonus points for killing predators.*

While hunting and trapping are important tools used in predator management, the Department does not have a means by which to award bonus points for this activity. This change would require amending rule.

Recommendation

The Department recommends that the Commission VOTE TO APPROVE THE HUNT GUIDELINES FOR FALL 2008 THROUGH SPRING 2010 AS PROPOSED.